

FILED 13 DEC 2022 16:47 USDC-ORP

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:22-cr-430-HZ

v.

INDICTMENT

ERIKA CHISTIE SALAS,

21 U.S.C. § 841(a)(1) and 841(b)(1)(A)

Defendant.

Forfeiture Allegation

THE GRAND JURY CHARGES:

COUNT 1

(Possession with the Intent to Distribute Cocaine)  
(21 U.S.C. § 841(a)(1) and 841(b)(1)(A))

On or about November 22, 2022, within the District of Oregon, defendant ERIKA CHISTIE SALAS did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(ii).

FORFEITURE ALLEGATION  
(Controlled Substance Offense)

Upon conviction of the offense in Count 1, defendant ERIKA CHISTIE SALAS shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violation and any Indictment

property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violation.

Dated: December 13<sup>th</sup>, 2022.

A TRUE BILL.

[Redacted]  
OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT  
United States Attorney

  
SCOTT M. KERIN, OSB # 965128  
Assistant United States Attorney